

# EXHIBIT 1

**KSAX-0043A**  
Case No.  
03-md-1570

**CONFIDENTIAL - SUBJECT TO MDL PROTECTIVE ORDER**  
**KSAX-0043A, Page 1 of 7**

**Steven R. Pounian**

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**From:** Rapawy, Gregory G. <grapawy@kellogghansen.com>  
**Sent:** Friday, July 23, 2021 6:17 PM  
**To:** zRobert Haefele; Carter, Sean; Steven R. Pounian; Jim Kreindler; Andrew J. Maloney; Megan Benett; zScott Tarbutton; Goldman, Jerry; zJodi W. Flowers; zDorothea Capone; NASP[rsheps@shepslaw.com]; cbaltier@fordmarrin.com; jog@speiserkrause.com; WTC[PByrnes@lockelord.com]; WTC[ATaylor@lockelord.com]; WTC[ppetrocelli@stroock.com]; skatz@butler.legal; gmcallister@cahill.com; WTC[trohback@axinn.com]; esnyder@jonesday.com; scottreau@jonesday.com; enitz@mololamken.com; rkry@mololamken.com; sumayya.khatib@lbkmlaw.com; jmandell@otmlaw.com; gsalem@georgesalempllc.com; zSarah S. Normand; Vargas, Jeannette  
**Cc:** Kellogg, Michael K.; Shen, Andrew C.  
**Subject:** RE: In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570-GBD-SN

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Counsel,

Thank you all for your responses. We have received the three PEC members' responses, separate responses from the *Beazley Furlonge* and *Charter Oak* plaintiffs, and the responses from Dallah Avco and the FBI.

Saudi Arabia's position is that the Court should be aware of the violation of its order and that a court-supervised process is needed as a step towards further enforcement of the order. Saudi Arabia further intends to request that all parties disclose and produce communications with Michael Isikoff from June 1, 2021 to the present, as set forth in my e-mail below, which some but not all of Plaintiffs' responses addressed. We will proceed to file. We will note Plaintiffs' representations that they were not the source of the disclosure and their preference for a voluntary information exchange.

We have considered Sarah's point and will not request that the FBI and DOJ be directed to file declarations at this time. So far as we are aware, the FBI and DOJ only ever received rough versions of the Al Jarrah transcripts, and the page count in the article ("more than 600") appears to match the final versions rather than the rough versions.

Regards,

Greg

---

**From:** Haefele, Robert <rhaefele@motleyrice.com>  
**Sent:** Friday, July 23, 2021 3:08 PM  
**To:** Carter, Sean <SCarter1@cozen.com>; Steven R. Pounian <spounian@kreindler.com>; Rapawy, Gregory G. <grapawy@kellogghansen.com>; Kreindler, James <jkreindler@kreindler.com>; Maloney, III, Andrew <amaloneyn@kreindler.com>; Benett, Megan <mbenett@kreindler.com>; Tarbutton, Joseph <starbutton@cozen.com>; Goldman, Jerry <jgoldman@andersonkill.com>; Flowers, Jodi <jflowers@motleyrice.com>; Capone, Thea <tcapone@baumeisterlaw.com>; NASP[rsheps@shepslaw.com] <rsheps@shepslaw.com>; cbaltier@fordmarrin.com; jog@speiserkrause.com; WTC[PByrnes@lockelord.com] <PByrnes@lockelord.com>; WTC[ATaylor@lockelord.com] <ATaylor@lockelord.com>; WTC[ppetrocelli@stroock.com] <ppetrocelli@stroock.com>; skatz@butler.legal; gmcallister@cahill.com; WTC[trohback@axinn.com] <trohback@axinn.com>; esnyder@jonesday.com; scottreau@jonesday.com; enitz@mololamken.com; rkry@mololamken.com; sumayya.khatib@lbkmlaw.com; jmandell@otmlaw.com; gsalem@georgesalempllc.com; WTC[sarah.normand@usdoj.gov] <sarah.normand@usdoj.gov>; Vargas, Jeannette <jeannette.vargas@usdoj.gov>  
**Cc:** Kellogg, Michael K. <mkellogg@kellogghansen.com>; Shen, Andrew C. <ashen@kellogghansen.com>  
**Subject:** [EXTERNAL] RE: In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570-GBD-SN

Greg,

I write separately on behalf of Motley Rice in response to your July 21, 2021 email regarding the July 15, 2021 article by Michael Isikoff of Yahoo! News, entitled "FBI tried to flip Saudi official in 9/11 investigation." On its face, the article suggests that a disclosure occurred that may have breached the Court's protective order (though we do not see a violation of the FBI order), and believe that all counsel who received the transcripts (plaintiffs, defendants, and the government) should assess whether someone under their respective umbrellas was that source. We do not, however, share the view that a formal discovery order is necessary or that any disclosure should require disclosure of protected information, as we believe the discovery you have proposed suggests. Notwithstanding, we are agreeable to working with you to review the matter. Indeed, as a result of our reading of the article, we took immediate action to investigate and determined last week that Motley Rice was not involved in the release of the transcript referenced in Mr. Isikoff's article.

Although we agree that all parties who received the Jarrah transcripts should investigate, the formal discovery order you have proposed is unnecessary and seemingly would implicate protected information. Motley Rice is, however, willing to offer sufficient information – without providing access to our work product – from our review to confirm our conclusion that the release did not come from Motley Rice. For example, on seeing the story published by Mr. Isikoff (which was the first we were alerted to the issue), Motley Rice promptly reviewed our IT systems to determine who had received the transcripts from the court reporter, and the extent to which it was moved. In this instance, we determined that it was received only by the attorneys who attended the deposition, forwarded once to a staff member who downloaded it to a secure location, and the file was not thereafter moved. Importantly, the review indicates that no one from Motley Rice forwarded the transcripts to Mr. Isikoff, to a client, nor to anyone outside of Motley Rice. Notably, however, we would object to any requirement identification of a potential expert who has not yet been identified in this litigation. Finally, we determined that no one from Motley Rice communicated electronically with Michael Isikoff during the period from the time the transcripts were received on June 28 through the date of the story on July 15, and we have no information to identify who that person may be.

We did not conduct a similar review regarding the transcripts of Messrs. Bayoumi and Thumairy because it was not apparent to us from the story that those transcripts were implicated. However, we have no reason to suspect that our review as to those transcripts would find anything different. Indeed, the existing review confirmed that no one has communicated with Mr. Isikoff even during the period dating to before our receipt of the Bayoumi and Thumairy transcripts.

We would add that, although we do not agree to that formal discovery is necessary, any request and any resulting order must require that all counsel that received the transcripts (plaintiffs, defendants, and the government) provide appropriate information, and must not require any disclosure of work product or other information beyond what is needed to show whether the Jarrah transcripts were disclosed in violation of the Court's order.

Regards,

**Robert Haefele** | Attorney at Law | Motley Rice LLC  
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**Cc:** Kellogg, Michael K. <[mkellogg@kellogghansen.com](mailto:mkellogg@kellogghansen.com)>; Shen, Andrew C. <[ashen@kellogghansen.com](mailto:ashen@kellogghansen.com)>

**Subject:** RE: In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570-GBD-SN

CAUTION:EXTERNAL

Greg,

Tagging on to Steve's email, we have not yet had a chance to confer with all of the plaintiffs' counsel on your list, owing to the Marks deposition yesterday and the Comras deposition today, but do plan to reach out to them as well.

As for Cozen O'Connor, and as indicated above, we are happy to cooperate by providing information confirming that the apparent disclosure of confidential information to Michael Isikoff has no linkage to us, subject to a reservation of all privileges etc.

The first notice we received that any confidential information may have been disclosed to Mr. Isikoff was the publication of the story itself. For a variety of reasons, we were confident from the outset that there was no possible link to our firm. Nonetheless, we regarded Mr. Isikoff's reporting that he had obtained a copy of the transcript to be a serious matter, and therefore initiated an internal inquiry that same day to verify that no person under our umbrella was involved in providing any confidential information or materials to Mr. Isikoff. We are confident that the results of that inquiry will eliminate any concerns as far as we are concerned, and we are willing to provide relevant and appropriate details pursuant to a voluntary process, without waiving any privileges.

Best, Sean

 **Sean P. Carter**  
**Member | Cozen O'Connor**  
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**From:** Steven R. Pounian <[Spounian@kreindler.com](mailto:Spounian@kreindler.com)>  
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**To:** Rapawy, Gregory G. <[grapawy@kellogghansen.com](mailto:grapawy@kellogghansen.com)>; zRobert Haefele <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)>; WTC[jkreindler@kreindler.com] <[jkreindler@kreindler.com](mailto:jkreindler@kreindler.com)>; WTC[amatoney@kreindler.com] <[amatoney@kreindler.com](mailto:amatoney@kreindler.com)>; Megan Bennett <[Mbenett@kreindler.com](mailto:Mbenett@kreindler.com)>; Carter, Sean <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)>; Tarbutton, J. Scott <[STarbutton@cozen.com](mailto:STarbutton@cozen.com)>; WTC[jgoldman@andersonkill.com] <[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)>; WTC[jflowers@motleyrice.com] <[jflowers@motleyrice.com](mailto:jflowers@motleyrice.com)>; WTC[tcapone@baumeisterlaw.com] <[tcapone@baumeisterlaw.com](mailto:tcapone@baumeisterlaw.com)>; NASP[rsheps@shepslaw.com] <[rsheps@shepslaw.com](mailto:rsheps@shepslaw.com)>; cbaltier@fordmarrin.com; jog@speiserkrause.com; WTC[PByrnes@lockelord.com] <[PByrnes@lockelord.com](mailto:PByrnes@lockelord.com)>; WTC[ATaylor@lockelord.com] <[ATaylor@lockelord.com](mailto:ATaylor@lockelord.com)>; WTC[ppetrocelli@stroock.com] <[ppetrocelli@stroock.com](mailto:ppetrocelli@stroock.com)>; skatz@butler.legal; gmcallister@cahill.com; WTC[trohback@axinn.com] <[trohback@axinn.com](mailto:trohback@axinn.com)>; esnyder@jonesday.com; scottreau@jonesday.com; enitz@mololamken.com; rkyr@mololamken.com; sumayya.khatib@lbkmlaw.com; jmandell@otmlaw.com; gsalem@georgesalempllc.com; WTC[sarah.normand@usdoj.gov] <[sarah.normand@usdoj.gov](mailto:sarah.normand@usdoj.gov)>; WTC[jeannette.vargas@usdoj.gov] <[jeannette.vargas@usdoj.gov](mailto:jeannette.vargas@usdoj.gov)>

**Cc:** Kellogg, Michael K. <[mkellogg@kellogghansen.com](mailto:mkellogg@kellogghansen.com)>; Shen, Andrew C. <[ashen@kellogghansen.com](mailto:ashen@kellogghansen.com)>

**Subject:** RE: In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570-GBD-SN

**\*\*EXTERNAL SENDER\*\***

Dear Greg,

We do not believe that there is any dispute among the parties that necessitates a motion.

The PECs share your concerns about the apparent disclosure of confidential information. The Cozen, Motley Rice, Kreindler, and Anderson Kill firms have each completed our own separate internal reviews of the handling of the Jarrah deposition transcript and contacts with Michael Isikoff. Each firm has determined that the transcript was not released through our firms or others working with our firms and are prepared to document the facts, if necessary.

Please let us know if the Kellogg firm and other counsel working for Saudi Arabia can give us the same assurances.

We did not conduct separate inquiries relating to the Bayoumi or Thumairy transcripts and are of the view that further inquiries are unnecessary under the circumstances.

We do not see the need for a formal court-ordered discovery process and have concerns that your proposal may require disclosure of privileged information or involve inquiries that are unnecessary under the circumstances.

If you would like, we can schedule a phone conference to resolve any outstanding issues. Please let us know.

Regards,

Steve

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**From:** Rapawy, Gregory G. <[grapawy@kellogghansen.com](mailto:grapawy@kellogghansen.com)>

**Sent:** Thursday, July 22, 2021 11:44 AM

**To:** zRobert Haefele <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)>; Steven R. Pounian <[Spounian@kreindler.com](mailto:Spounian@kreindler.com)>; Jim Kreindler <[JKreindler@kreindler.com](mailto:JKreindler@kreindler.com)>; Andrew J. Maloney <[AMaloney@kreindler.com](mailto:AMaloney@kreindler.com)>; Megan Benett <[Mbenett@kreindler.com](mailto:Mbenett@kreindler.com)>; Carter, Sean <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)>; zScott Tarbutton <[starbutton@cozen.com](mailto:starbutton@cozen.com)>; Goldman, Jerry <[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)>; zJodi W. Flowers <[jflowers@motleyrice.com](mailto:jflowers@motleyrice.com)>; zDorothea Capone <[tcapone@baumeisterlaw.com](mailto:tcapone@baumeisterlaw.com)>; rsheps@shepslaw.com; cbaltier@fordmarrin.com; jog@speiserkrause.com; pbyrnes@lockelord.com; ataylor@lockelord.com; ppetrocelli@stroock.com; skatz@butler.legal; gmcallister@cahill.com; trohback@axinn.com; esnyder@jonesday.com; scottreau@jonesday.com; enitz@mololamken.com; rkry@mololamken.com; sumayya.khatib@lbkmlaw.com; jmandell@otmlaw.com; gsalem@georgesalempc.com; zSarah S. Normand <[sarah.normand@usdoj.gov](mailto:sarah.normand@usdoj.gov)>; Vargas, Jeannette <[jeannette.vargas@usdoj.gov](mailto:jeannette.vargas@usdoj.gov)>

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**Subject:** RE: In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570-GBD-SN

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Bob,

Thanks for your response. We will hold off filing until we receive Plaintiffs' position, or 3 pm tomorrow (Friday), whichever comes first.

Regards,

Greg

**From:** Haefele, Robert <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)>  
**Sent:** Thursday, July 22, 2021 11:19 AM  
**To:** Rapawy, Gregory G. <[grapawy@kellogghansen.com](mailto:grapawy@kellogghansen.com)>; Steven R. Pounian <[spounian@kreindler.com](mailto:spounian@kreindler.com)>; Kreindler, James <[jkreindler@kreindler.com](mailto:jkreindler@kreindler.com)>; Maloney, III, Andrew <[amaloneyn@kreindler.com](mailto:amaloneyn@kreindler.com)>; Benett, Megan <[mbennet@kreindler.com](mailto:mbennet@kreindler.com)>; Carter, Sean <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)>; Tarbutton, Joseph <[starbutton@cozen.com](mailto:starbutton@cozen.com)>; Goldman, Jerry <[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)>; Flowers, Jodi <[jflowers@motleyrice.com](mailto:jflowers@motleyrice.com)>; Capone, Thea <[tcapone@baumeisterlaw.com](mailto:tcapone@baumeisterlaw.com)>; rsheps@shepslaw.com; cbaltier@fordmarrin.com; jog@speiserkrause.com; pbyrnes@lockelord.com; ataylor@lockelord.com; ppetrocelli@stroock.com; skatz@butler.legal; gmcallister@cahill.com; trohback@axinn.com; esnyder@jonesday.com; scottreau@jonesday.com; enitz@mololamken.com; rkry@mololamken.com; sumayya.khatib@lbkmlaw.com; jmandell@otmlaw.com; gsalem@georgesalempllc.com; sarah.normand@usdoj.gov; Vargas, Jeannette <[jeannette.vargas@usdoj.gov](mailto:jeannette.vargas@usdoj.gov)>  
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**Subject:** [EXTERNAL] RE: In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570-GBD-SN

Greg – While I think I can say that there is shared concern on our side as to how the release may have happened, we believe it would be appropriate for us to confer on our side, including with the various non-PECs counsel listed on your email, to address your request. However, we are not in a position to do so today given that we are in the midst of the deposition of WAMY's expert, Jonathan Marks. We also have a deposition set for tomorrow of one of the plaintiffs' experts. However, we can commit to trying to confer by tomorrow at 3 pm. Can you please allow us that time to confer before getting back to you?

Regards,

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**Subject:** In re Terrorist Attacks on September 11, 2001, No. 1:03-md-01570-GBD-SN

CAUTION:EXTERNAL

#### SUBJECT TO MDL PROTECTIVE ORDER

Counsel.

On July 15, 2021, Michael Isikoff of Yahoo! News published an article entitled “FBI tried to flip Saudi official in 9/11 investigation.” The article states that “a copy of the [Mussaed Al Jarrah] deposition – with some redactions for law-enforcement sensitive material – was obtained exclusively by Yahoo News” and describes in detail certain portions of the content of that deposition, including verbatim transcript quotations. The article further describes the

contents of the Omar Al Bayoumi and Fahad Al Thumairy depositions. The disclosure to Mr. Isikoff is a clear and serious violation of the MDL Protective Order and potentially of the FBI Protective Order.

Tomorrow (July 22), Saudi Arabia intends to file a motion requesting that the Court order targeted discovery to determine who disclosed this confidential information to Mr. Isikoff. Specifically, the motion will request that the Court direct all entities or individuals who received or had access to the transcripts of the Al Jarrah, Al Bayoumi, and Al Thumairy depositions to submit declarations stating to whom they provided these transcripts and to identify, describe, and where applicable produce, all communications with Mr. Isikoff from June 1, 2021 to the present.

Please inform us by no later than tomorrow at 3 pm whether your clients consent to this requested relief. Saudi Arabia reserves all rights to seek further relief concerning this matter.

Regards,

Gregory G. Rapawy  
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